

**REMARKS**

Claims 1-21 have all been examined and are all pending in the application.

**I. Preliminary matter**

Applicant notes the Examiner did not indicate acceptance of the drawings in the Office Action. Accordingly, the Examiner is requested to indicate acceptance in the next action.

**II. Rejections under 35 U.S.C. § 103(a).**

Claims 1-3, 5-10, 12-19 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Carroll (US 2001/0041591). Applicant respectfully traverses the rejection.

**A. Independent Claim 1**

Claim 1 recites, *inter alia*, a method of supplying configuration data to a mobile telephony device equipped with *AT command management means able to interpret AT commands for exchanging service configuration data between a terminal and a device*.

Applicant respectfully submits that the Examiner's assertion, that paragraphs [0004]-[0009] of Carroll teach a method of supplying configuration data to mobile telephony device equipped with AT command management means, is incorrect. In particular, Applicant submits that the user/carrier key management infrastructure suggested in Carroll is for authenticating the wireless system and does not *exchange service configuration data between the terminal and the device by means of AT commands* as recited in claim 1.

Moreover, as it is known to one skilled in the art, the standard air interface is a radio frequency link between the mobile telephone and a base station and does not include an AT command means or utilize AT commands. Also, Carroll teaches a process in which provisioning

information is merely transferred to the target telephone using the standard air interface (page 4, paragraph [0052]). Carroll's disclosure of transferring of provisioning information from a WUPD to a mobile device does not teach or suggest the *use of AT commands for exchanging service configuration data between a terminal and a device* (page 1, paragraph [0006]).

In response to the Applicant's argument in the Amendment filed November 12, 2006, the Examiner maintains that:

Carroll teaches the terminal and the telephone that used the standard air interface to activate the wireless device in which are using the authentication key and/or key management infrastructure for the authentication-based wireless system uses such as a key (A-key) for generating and distributing by the Service Provider and input to the device using either manual entry by the customer or electronic distribution at the point of sale (See paragraph [0004-0005]), and Carroll further teaches the user used the keypad of the cellular telephone to dial telephone numbers and to enter sequences of number that allow the user to authenticate the cellular telephone in which equates to command. One skilled in the art would know (e.g., A-key) transfer security and/or performance and efficiency of the cellular network (See paragraph [0041-0043, 0051-0054]).

Furthermore, in the present context the expression "AT commands" in the Applicant's Specification indicated that "AT commands refers to commands of the type originally developed by the American company Hayes Microcomputer Products Inc. (See Applicant paragraph [0007]).

However, Carroll's disclosure of a user's unique authentication key (A-key) generated by a service provider input to a device does not teach or suggest AT commands. The user/carrier key management infrastructure uses a key hierarchy generated from a user's unique

authentication key to authenticate wireless system. Furthermore, the A-key is a 64-bit value used to generate a user's temporary authentication keys as well as privacy keys for data, voice and messaging (See paragraph [0005]). Therefore, the A-key is directed towards verification of wireless system between the carrier and user and does not relate to exchanging service configuration data between the terminal and device by means of selected AT commands.

Accordingly, Applicant submits that Carroll does not teach or suggest "exchanging service configuration data between the terminal and the device by means of selected AT commands that the AT commandment means of said device are able to interpret", as required by claim 1. Thus, the Examiner is requested to withdraw the 35 U.S.C. § 103 rejection of claim 1.

**B. Dependent Claims 2-8**

Claims 2-8 are dependent on claim 1, and therefore, are allowable by virtue of their dependency and because of the additional limitations therein.

**C. Independent Claim 9**

Claim 9 recites, *inter alia*, a mobile telephony device comprising an AT command management means adapted to set up a connection with a terminal containing service configuration data in order to exchange service configuration data with said terminal by means of selected AT commands that its AT command management means are able to interpret. Therefore, claim 9 is allowable at least for the same reasons claim 1 is allowable.

**D. Dependent Claims 10-13**

Claims 10-13 are dependent on claim 9, and therefore, are allowable by virtue of their dependency and because of the additional limitations therein.

**E. Dependent Claim 14**

Claim 14 is dependent on claim 9 and recites a data processing terminal comprising a memory for storing service configuration data, and provisioning means adapted to set up a connection with a mobile telephony device according to claim 9 and to exchange service configuration data with said device by means of selected AT commands which the AT command management means of said device are able to interpret. Therefore, claim 14 is allowable by virtue of its dependency and also *at least* for the same reasons claims 1 and 9 are allowable.

**F. Dependent Claims 15-18**

Claims 15-18 are dependent on claim 14, and therefore, are allowable by virtue of their dependency and because of the additional limitations therein.

**G. Dependent Claims 19-21**

Claims 19-21 are dependent on claim 1, and therefore, are allowable by virtue of their dependency and because of the additional limitations therein.

**III. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Response Under 37 C.F.R. § 1.116  
U.S. Appln No. 10/518,403

Atty Docket. No. Q85026

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



---

Christopher R. Lipp  
Registration No. 41,157

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: April 24 2007